

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

SOUTHERN CALIFORNIA PUBLIC  
POWER AUTHORITY, *et al.*,

Plaintiffs,

V.

## ULTRA RESOURCES, INC.

### Defendants/Counter-Claimant,

V.

SOUTHERN CALIFORNIA PUBLIC  
POWER AUTHORITY, *et al.*,

## Counter-Defendants.

VANGUARD NATURAL RESOURCES,  
LLC, *et al.*,

### Debtors,

V.

# ULTRA RESOURCES, INC.

## Claimant.

Civil Action No. 4:19-cv-00090

Hon. Vanessa D. Gilmore

**PINEDALE ENERGY, INC. AND STANDARD ENERGY CORP.'S  
RESPONSE TO ORIGINAL PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Counter-Defendants Pinedale Energy, Inc. (“Pinedale”) and Standard Energy Corp. (“Standard”) file this *Response* (“Response”) to *Original Plaintiffs’ Motion for Summary Judgment* [Dkt. No. 33] filed by Southern California Public Power Authority and Turlock Irrigation District (“SCPPA/Turlock Motion”), and respectfully show the Court as follows:

1. Pinedale and Standard join and incorporate the facts and arguments from *Ultra Resources, Inc.’s Motion for Partial Summary Judgment* [Dkt. No. 44] (“Ultra’s Motion”), insofar as Section II, entitled “‘Collateral Estoppel’ Does Not Oblige the Court to Endorse a Clearly

*Erroneous Interpretation of the SAA,”* (located within ¶¶ 50-93, on pgs. 20-40) into this Response as though set forth in full.

2. Pinedale and Standard also incorporate the facts and arguments from *Pinedale Energy, Inc. and Standard Energy Corp.’s Motion for Partial Summary Judgment Pertaining to the Interpretation of the Supplemental Accounting Agreement* [Dkt. No. 38] into this Response as though set forth in full.

3. Pinedale and Standard also incorporate the arguments from *Ultra Resources, Inc.’s Consolidated Response to Plaintiff/Counter-Defendants’ Motion for Summary Judgment* [Dkt. No. 45] into this Response as though set forth in full.

Dated: July 26, 2019.

Respectfully submitted,

**McGINNIS LOCHRIDGE LLP**

/s/ Christopher L. Halgren

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**ATTORNEYS FOR  
PINEDALE AND STANDARD**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this Friday, July 26, 2019, the foregoing was filed with the Court and served via the Court's CM/ECF system to all of the parties registered to receive such notice.

*/s/ Christopher L. Halgren*

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Christopher L. Halgren